

GOGICK, BYRNE & O'NEILL, LLP

Attorneys at Law

11 Broadway
New York, NY 10004-1314
Tel: (212) 422-9424
Fax: (212) 422-9429

304 South Franklin Street
Syracuse, NY 13202
Tel: (315) 218-9590
Fax: (315) 218-9591

80 Main Street
West Orange, NJ 07052-5414
Tel: (973) 778-7074
Fax: (973) 731-9319

112 Prospect Street
Stamford, CT 06901-1207
Tel: (203) 327-7561
Fax: (203) 966-1431

Robert J. Gogick[†]
Kevin J. O'Neill[†]
Michael J. Byrne^{*}

Stephen P. Schreckinger[†]
Elaine C. Gangel[▲]
Albert Wesley McKee[°]

John M. Rondello, Jr.[▲]
Anthony W. Vaughn, Jr.[†]
Mark R. McCauley[▲]
Bryan R. Weber[□]
Pamela M. Harinstein^{*}
Jamie M. Thomas[†]
Eyal S. Eisig[▲]
Sushmita Roy[†]

^{*} Admitted in NY, NJ & CT
[°] NY, NJ & PA
[†] NY & NJ
[□] NY & CT
[▲] NY only

October 8, 2010

VIA ECF

Honorable Viktor Pohorelsky
United States District Court - Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Brown v. St. John's University, CASE NO.: 08-CV-2218 (ARR-VVP)

**HM WHITE SITE ARCHITECTS' RESPONSE TO PLAINTIFF AND DEFENDANT
LANGAN'S MOTIONS TO COMPEL**

Dear Judge Pohorelsky:

We represent defendant/fourth-party defendant HM White Site Architects ("HMW") in the above-referenced matter.

We are writing to address plaintiff and defendant Langan Engineering and Environmental Services, Inc.'s ("Langan") motions to compel. Prior to the instant motions, we attempted to comply with all the discovery requested and were unable to do so. We have since provided both plaintiff and Langan with the entire discovery demanded as per our recent responses (Attached herein as "Exhibit A"). In addition, HMW at its own expense has provided both plaintiff and Langan with voluminous bates stamped records responsive to their respective demands on cds. As per our responses, kindly render these motions moot as to HMW.

Respectfully submitted,

/S/ Eyal S. Eisig

Eyal S. Eisig, Esq.

cc: Registered ECF users